

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, FLORENCE DIVISION

James R. Watson, Jr. v. Meta Platforms Technologies, LLC and
C.S.C. Global

Watson · No. 4:26-cv-1351-SAL · Decided May 20, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s Report and Recommendation and summarily dismisses James R. Watson, Jr.’s action as duplicative of an earlier, statute-of-limitations-barred case involving the compromise of his Instagram account. The court overrules Watson’s objections, dismisses the action without prejudice and without issuance or service of process, and terminates his pending motions as moot.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Florence Division
WRITING FOR THE COURT	Sherri A. Lydon
JURISDICTION	United States District Court for the District of South Carolina, Florence Division
DECIDED	May 20, 2026
DOCKET	4:26-cv-1351-SAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending summary dismissal of the pro se plaintiff's action as duplicative of an earlier, time-barred action. After reviewing the plaintiff's objections, the district court adopted the Report and dismissed the case without prejudice and without issuance and service of process.
STANDARD OF REVIEW	The district court reviews de novo those portions of a magistrate judge's report and recommendation to which a party makes sufficiently specific objections. For general objections, the court need only satisfy itself that there is no clear error on the face of the record before adopting the recommendation.

TOPICS

statute of limitations

appellate procedure

civil procedure

pleadings

PRACTICE AREAS

Civil procedure

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Pro se litigation

QUESTIONS PRESENTED

1. Whether the district court properly reviewed and adopted the magistrate judge's recommendation after considering plaintiff's objections.
2. Whether the action was duplicative of plaintiff's earlier action and therefore subject to summary dismissal.
3. Whether plaintiff could avoid the statute-of-limitations bar by characterizing the claims as arising from defendants' conduct occurring from 2023 through 2025.

HOLDINGS

1. A district court must review de novo the portions of a magistrate judge's report or specified proposed findings to which a party makes sufficiently specific objections; when objections are only general, the court need determine only whether there is clear error on the face of the record before adopting the recommendation.
2. A district court may summarily dismiss an action as duplicative when the parties, issues, and available relief do not significantly differ from those in an earlier action.
3. A plaintiff cannot avoid a statute-of-limitations bar by relabeling claims arising from the same underlying injury and events as claims based on later efforts to remedy that injury.

KEY QUOTATIONS

“The recommendation has no presumptive weight, and the responsibility to make a final determination remains with this court.” (Review of a Magistrate Judge's Report)

“This case is duplicative of Plaintiff's earlier, closed case.” (Discussion)

FACTUAL BACKGROUND

Plaintiff's Instagram account was compromised in 2018, including a change to the email address associated with the account. He attempted to recover the account through communications with the defendants, but was unsuccessful. After his earlier action concerning the compromise and recovery efforts was dismissed as time-barred and affirmed on appeal, he filed this action based on the same underlying events while asserting that the claims concerned the defendants' conduct from 2023 through 2025.

PROCEDURAL HISTORY

Plaintiff previously sued the defendants over the compromise of his Instagram account and account-recovery efforts. The earlier action was dismissed as barred by the statute of limitations, and the Fourth Circuit affirmed on March 30, 2026. Plaintiff filed this action the next day, asserting claims arising from the same 2018 compromise while characterizing them as based on conduct occurring from 2023 through 2025. The magistrate judge recommended summary dismissal as duplicative, and the district court overruled plaintiff's objections, adopted the recommendation, and dismissed the case.

DISPOSITION

dismissed

CASES CITED

- Watson v. Meta Platforms Technologies, LLC, C/A No. 4:25-cv-8217-SAL, ECF Nos. 19, 34
- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Elijah v. Dunbar, 66 F.4th 454, 459-60 (4th Cir. 2023)
- United States v. Midgette, 478 F.3d 616, 622 (4th Cir. 2007)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Bayle v. South Carolina Department of Transportation, 542 S.E.2d 736, 740 (S.C. Ct. App. 2001)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Weller v. Department of Social Services, 901 F.2d 387, 390-91 (4th Cir. 1990)
- Cottle v. Bell, 229 F.3d 1142 (4th Cir. 2000) (Table)

OPINION

IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA FLORENCE DIVISION James R. Watson, Jr., C/A No. 4:26-cv-1351-SAL Plaintiff, v. ORDER Meta Platforms Technologies, LLC, C.S.C. Global, Defendants. This matter is before the court for review of the Report and Recommendation of United States Magistrate Judge Thomas E. Rogers, III, made in accordance with 28 U.S.C. § 636(b)(1)(B) and Local Civil Rule 73.02(B)(2)(e) (D.S.C.) (“Report”).

[ECF No. 11.] In the Report, the magistrate judge recommends summarily dismissing this matter because it is duplicative of another action, Watson v. Meta Platforms Technologies, LLC, C/A No. 4:25-cv-8217-SAL (“Watson v. Meta I”), that was previously dismissed as barred by the statute of limitations. Id. Plaintiff objects to the recommended disposition. [ECF No. 13.]

For the reasons that follow, this court overrules his objections and dismisses this case. BACKGROUND AND PROCEDURAL HISTORY The Report outlines the relevant facts and standards of law. [ECF No. 11.] This court incorporates those facts and standards in this order.

Briefly, Plaintiff's Instagram account was compromised in 2018, and he attempted to bring claims against Defendants in 2025 based on their failure to restore his account.

But this court dismissed the case as it was filed well after the statute of limitations had run.¹ See *Watson v. Meta I*, ECF No. 19. Plaintiff appealed, and the Fourth Circuit affirmed the dismissal on March 30, 2026. See *Watson v. Meta I*, ECF No. 34.

The following day, Plaintiff filed the instant action, alleging claims against Defendants arising out of the 2018 compromise of his Instagram account, but claiming his claims were only for their actions from 2023 to 2025. See ECF No. 1.

The magistrate judge recommends that this court summarily dismiss this case as duplicative of his earlier dismissed action. [ECF No. 11.] Plaintiff objects. [ECF No. 13.] REVIEW OF A MAGISTRATE JUDGE'S REPORT The magistrate judge makes only a recommendation to this court.

The recommendation has no presumptive weight, and the responsibility to make a final determination remains with this court. See *Mathews v. Weber*, 423 U.S. 261, 270–71 (1976). In response to a recommendation, any party may serve and file written objections. *Elijah v. Dunbar*, 66 F.4th 454, 459 (4th Cir. 2023) (citing 28 U.S.C. § 636(b)(1) and Fed. R. Civ. P. 72(b)(3)).

The district court then reviews de novo those portions of the report or specified proposed findings or recommendations to which objection is made. *Id.* To trigger de novo review, an objecting party must object with sufficient specificity to reasonably alert the district court of the true ground for the objection. *Id.* (quoting *United States v. Midgette*, 478 F.3d 616, 622 (4th Cir.

2007)). If a litigant objects only generally, the court need not explain adopting the Report and must “only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.” *Diamond v. Colonial Life & Acc. Ins. Co.*, 416 F.3d 310, 315 (4th Cir. 2005) (citing Fed. R. Civ. P. 72 advisory committee's note). An objection is specific so long as it alerts the district court that the litigant believes the 1 In South Carolina, the three-year statute of limitations for a negligence action begins to run “when a cause of action reasonably ought to have been discovered.” *Bayle v. S.C.*

Dep't of Transp., 542 S.E.2d 736, 740 (S.C. Ct. App. 2001). magistrate judge erred in recommending dismissal of that claim. *Elijah*, 66 F.4th at 460. Objections need not be novel to be sufficiently specific. *Id.* But a party must do more than state, “I object.” *Id.* Because Plaintiff is proceeding pro se, the court is charged with liberally construing the pleadings to allow him to fully develop potentially meritorious claims.

See *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (“A document filed pro se is ‘to be liberally construed,’ and ‘a pro se complaint, however inartfully pleaded, must be held to less stringent

standards than formal pleadings drafted by lawyers.’” (quoting *Estelle v. Gamble*, 429 U.S. 97, 106 (1976))). That said, the requirement of liberal construction does not mean that the court can ignore a clear failure in the pleading to allege facts which set forth a claim currently cognizable in a federal district court.

Weller v. Dep’t of Soc. Servs., 901 F.2d 387, 390–91 (4th Cir. 1990). DISCUSSION The court agrees with the recommended dismissal of this action. This case is a duplicate of Plaintiff’s earlier action, *Watson v. Meta Platforms Technologies, LLC*, C/A No. 4:25-cv-8217- SAL, which the court found was time-barred. Plaintiff objects, arguing this is a different case because it is based on Defendants’ conduct from 2023 through 2025.

See ECF No. 13. But a review of Plaintiff’s own pleadings shows this is plainly the same case—Plaintiff’s Instagram was compromised in 2018, and since then he has attempted to recover his account through communication with Defendants to no avail. See ECF No. 1-2 (emails from 2018 alerting Plaintiff that the email address associated with djwattslive had changed).

The court has already explained to Plaintiff that this action is time-barred because Plaintiff’s injury first arose in 2018. See *Watson y. Meta I*, ECF No. 19. And the Fourth Circuit affirmed. See *Watson v. Meta I*, ECF No. 34. His efforts to reframe his case to avoid the statute of limitations bar fail. This case is duplicative of Plaintiff’s earlier, closed case.

It is subject to summary dismissal for the reasons outlined above and in the Report. *Cottle v. Bell*, 229 F.3d 1142 (4th Cir. 2000) (Table) (“Because district courts are not required to entertain duplicative or redundant lawsuits, they may dismiss such suits as frivolous pursuant to § 1915(e). Generally, a lawsuit is duplicative of another one if the parties, issues, and available relief do not significantly differ between the two.” (internal citations omitted)).

Plaintiffs objections are overruled. CONCLUSION For the reasons set forth above, the Report, ECF No. 11, is adopted and incorporated. This action is SUMMARILY DISMISSED without prejudice and without issuance and service of process. Plaintiff’s Motion for Service of Process by U.S. Marshal (ECF No. 5) and Motion for PACER Fee Exemption (ECF No. 6) are also TERMINATED AS MOOT.

IT IS SO ORDERED. Sherr x. May 20, 2026 Sherri A. Lydon Columbia, South Carolina United States District Judge